

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AMERICAN CHEMICAL SOCIETY,

Plaintiff,

v.

ACSMOBILE.ORG, an Internet domain name,

Defendant.

Civil Action No. 1:19-823-RDA-TCB

**PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL AND/OR REDACTED
DOCUMENTS FOR GOOD CAUSE**

Pursuant to Local Civil Rule 5, Plaintiff American Chemical Society (“ACS”), by counsel, hereby moves for leave to file a redacted version of the following documents and/or temporarily file the Declaration of David E. Weslow in Support of Plaintiff’s Motion for Preliminary Injunction and the exhibit thereto. Sealing this portion of the file is necessary due to the inappropriate and obscene nature of the content thereof. Specifically, the Declaration references and the exhibit contains pornographic material necessary to support Plaintiff’s request for relief but inappropriate for public access through the Court’s files. In support of its motion, Plaintiff relies on its Memorandum in Support and the Proposed Order filed herewith.

Date: July 16, 2019

/s/ Attison L. Barnes, III

Attison L. Barnes, III (VA Bar No. 30458)

David E. Weslow (*for pro hac admission*)

Alexander B. Owczarczak (*for pro hac admission*)

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